

Rapaport Law Firm, PLLC
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**INVOICE/STATEMENT OF
SERVICES**

December 23, 2022

Matter Name: PMG FLSA 2019

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
<u>Marc A. Rapaport</u>				
11/7/2019	MR	Meeting with Mr. and Mrs. Liz; Mr. Bonilla; Mr. Ferreira and Daniel Rodriguez	1.50 450.00/hr	675.00
11/16/2019	MR	Further meeting with clients in office; MC as interpreter	1.50 450.00/hr	675.00
12/17/2019	MR	Draft complaint	2.00 450.00/hr	900.00
12/22/2019	MR	Contin drafting complaint, and fact investigation relating to same; review public records relating to defendants and the subject buildings	2.00 450.00/hr	900.00
12/23/2019	MR	Further drafting of complaint; email to MM and K. Gulfo; further analysis of prior proceedings in state court relating to buildings and consideration of appropriate defendants	1.50 450.00/hr	675.00
1/8/2020	MR	Extensive edits to complaint	2.50 450.00/hr	1,125.00
1/10/2020	MR	Revisions/edits to complaint; review cover sheet and summonses	1.50 450.00/hr	675.00
	MR	Telephone call with Francisco Liz	0.30 450.00/hr	135.00
1/11/2020	MR	Meeting with Mr. and Ms. Liz, Mr. Ferreira, and Mr. Bonilla; MC as interpreter; review new documents	1.00 450.00/hr	450.00
1/18/2020	MR	Meeting with new opt-in, Mario Villanueva and MC as interpreter; draft retainer and consent form; file consent form	2.00 450.00/hr	900.00
1/24/2020	MR	Comm's with Mr. and Ms. Liz; receive and review documents	0.20 450.00/hr	90.00

			Hrs/Rate	Amount
2/25/2020	MR	Telephone call with PMG's attorney regarding PMG's request to discontinue case as against PMG because they allegedly are not a joint employer	0.30 450.00/hr	135.00
4/7/2020	MR	Review documents from Michael Doyle, Esq. and comm's re his request that PMG be dismissed from case	0.50 450.00/hr	225.00
4/8/2020	MR	Email to all counsel of record	0.20 450.00/hr	90.00
5/13/2020	MR	Court-ordered conference call with all counsel of record re: mediator selection	1.00 450.00/hr	450.00
5/15/2020	MR	T/C with Mr. and Mrs. Liz	0.50 450.00/hr	225.00
5/18/2020	MR	Attention to damages calculations; comm's with KG re [REDACTED]; telephone call with MM	1.50 450.00/hr	675.00
7/2/2020	MR	Emails with defendants' counsel re confidentiality of pre-mediation disclosures; confirm that Plaintiffs agree to same	0.20 450.00/hr	90.00
7/5/2020	MR	Consider mediation strategy and comm's with M Miller re [REDACTED]	0.50 450.00/hr	225.00
7/8/2020	MR	Conference call with three clients, MC, M Miller and KG; preparation for same	1.00 450.00/hr	450.00
7/16/2020	MR	Zoom mediation	7.00 450.00/hr	3,150.00
8/25/2020	MR	Review proposed Case Discovery/Managing Plan for submission to Court; Edits to same to reflect anticipated conditional certification motion; telephone calls and emails with MM re same;	1.00 450.00/hr	450.00
	MR	Telephone call with J. Bonilla re: [REDACTED] with K Gulfo as interpreter	0.20 450.00/hr	90.00
9/2/2020	MR	Review and analyze documents provided by Mr. Malley; draft email to Mr. Malley re same	1.00 450.00/hr	450.00
9/8/2020	MR	Review documents provided by attorney Malley re: opt-in plaintiff Jony Bonilla. Comm's with KG re same	0.50 450.00/hr	225.00
	MR	Telephone call with Ana Liz re: [REDACTED] (KG as interpreter)	0.30 450.00/hr	135.00
9/28/2020	MR	Further attention to drafting first notice to produce to PMG	2.00 450.00/hr	900.00
9/29/2020	MR	Revisions to first request for document production directed to defendant PMG	0.60 450.00/hr	270.00
	MR	Telephone call with Meredith Miller, Esq. regarding: [REDACTED]	0.13 450.00/hr	60.00
9/30/2020	MR	Attention to discovery demands (written discovery to 5 Tellers)	1.50 450.00/hr	675.00

			Hrs/Rate	Amount
10/8/2020	MR	Attention to: fact investigations regarding PMG for anticipated motion to prelim approval as collective; meeting in office with paralegal J Orellana re same	1.50 450.00/hr	675.00
10/15/2020	MR	Extensive revisions to and additions to interrogatories to PMG	1.00 450.00/hr	450.00
10/16/2020	MR	Attention to motion for preliminary certification as collective; conference call with Mr. and Mrs. Liz, with KG as interpreter; draft Liz declaration; review background work records; emails with MM	2.50 450.00/hr	1,125.00
	MR	Prepare initial draft Francisco Liz Declaration	1.00 450.00/hr	450.00
10/27/2020	MR	Draft objections to Defendant 5 Tellers' First Requests for Production and legal research relating to same	2.00 450.00/hr	900.00
10/30/2020	MR	Draft letter to Magistrate Judge Reyes re re request to extend deadlines in briefing schedule	0.20 450.00/hr	90.00
	MR	Four telephone calls with Mr. Ferreira and Mr. Villanueva re: [REDACTED] [REDACTED] K Gulfo as interpreter	0.50 450.00/hr	225.00
11/3/2020	MR	Attention to Motion for Conditional Cert: prepare initial draft of Bonilla Declaration in support of motion for condit. cert.; legal research; draft portions of memo of law. Review background facts	5.00 450.00/hr	2,250.00
11/4/2020	MR	Draft Ferreira Declaration in support of motion for conditional certification	1.50 450.00/hr	675.00
11/6/2020	MR	Draft Rapaport Declaration in Support of Motion for Condit Cert	1.50 450.00/hr	675.00
11/24/2020	MR	Draft responses and objections to defendants (5 Tellers) First Production Requests	2.00 450.00/hr	900.00
11/25/2020	MR	Review and edit KG's revisions to Plaintiffs' responses to 5 Tellers' First Requests for Production of Documents; further edits to same; review additional production.	1.50 450.00/hr	675.00
12/16/2020	MR	Communication with client Mario Villanueva, J.Orellana as interpreter.	0.10 450.00/hr	45.00
12/31/2020	MR	Telephone call with witness [REDACTED] KG as interpreter; email to M Miller	0.20 450.00/hr	90.00
1/7/2021	MR	Telephone call with witness [REDACTED] K. Gulfo as interpreter; review of Defts' Opp to certf. motion	1.00 450.00/hr	450.00
1/14/2021	MR	Attention to: Reply Memo of Law - drafting and research	3.00 450.00/hr	1,350.00
1/19/2021	MR	Meeting with Jose Blanco in office	2.00 450.00/hr	900.00
1/28/2021	MR	Receive and review letter from PMG's attorney regarding our concerns regarding defendants' comm's with new opt-in	0.20 450.00/hr	90.00

			Hrs/Rate	Amount
1/29/2021	MR	Telephone call with Ramon Ferreira, [REDACTED] JO as interpreter. Discussions with MM and MC re same; review HPD and ACRIS re 2734 Edgcombe	0.60 450.00/hr	270.00
	MR	Review letter from attorney for PMG relating to Mr. Blanco; consider strategy re [REDACTED]	0.42 450.00/hr	187.50
1/30/2021	MR	Meeting in office with Ramon R. Ferreira; [REDACTED] M Cabezas as interpreter. Receive and review background documents; extensive discussion with client; file opt-in	1.50 450.00/hr	675.00
	MR	Draft email to M Miller	0.10 450.00/hr	45.00
2/2/2021	MR	Discussion with KG re: [REDACTED]	0.20 450.00/hr	90.00
	MR	Tel. call with Mr. Blanco with KG as Spanish interpreter	0.30 450.00/hr	135.00
3/10/2021	MR	Review def. PMG's comm's to Mr. Blanco, including PMG's letter dated 2/26/21. Teleph call with Mr. Blanco re [REDACTED]	0.50 450.00/hr	225.00
3/24/2021	MR	Further attention to drafting responses and objections to defendant PMG's first Interrogatories; review documents produced by plaintiffs; extensive conference with M Miller re [REDACTED]	3.00 450.00/hr	1,350.00
3/26/2021	MR	Edit/review discovery responses	0.70 450.00/hr	315.00
3/29/2021	MR	Extensive revisions to interrogatory answers; comm's with K Gulfo re [REDACTED]	1.00 450.00/hr	450.00
5/21/2021	MR	T/C with Ramon Ferreira; K. Gulfo as interpreter	0.50 450.00/hr	225.00
8/17/2021	MR	Review 5 Tellers' reply papers re: motion practice relating to its cross-claims	0.50 450.00/hr	225.00
9/3/2021	MR	Telephone calls with Wally Ferreira and Ms. Liz, with JO as Spanish interpreter	1.00 450.00/hr	450.00
	MR	Review defendants' newly-issued discovery demands	1.00 450.00/hr	450.00
	MR	Telephone call with opt-in plaintiff Hernandez; with MC as interpreter	0.20 450.00/hr	90.00
9/4/2021	MR	Revisions to interrogatory responses by Ms. Liz and Waly Ferreira	1.50 450.00/hr	675.00
9/9/2021	MR	Further attention to discovery responses, particularly rog resp's; lengthy meeting with KG re same	2.00 450.00/hr	900.00

			Hrs/Rate	Amount
9/30/2021	MR	Drafting of Hernandez rog responses; lengthy call with Mr. Hernandez with KG as interpreter	1.00 450.00/hr	450.00
10/1/2021	MR	Review our discovery demands to PMG and comm's with MM re [REDACTED]	0.60 450.00/hr	270.00
10/4/2021	MR	Respond to PMG's attorney regarding discovery issues; draft response to same; telephone call with MM re [REDACTED]	0.50 450.00/hr	225.00
10/6/2021	MR	Lengthy meeting with Jose Hernandez with KG as interpreter; extensive revisions to rog responses; draft two declarations; telephone call with PMG's attorney; email to PMG's attorney; comm's with MM; review MM's revisions to Mr. Hernandez's declaration and make further revisions; explanation of same to client	3.00 450.00/hr	1,350.00
	MR	Tel. call with MM re: [REDACTED] [REDACTED]	0.50 450.00/hr	225.00
10/27/2021	MR	Attention to defendant PMG's motion to assert third party claims; review/revise MM's draft opp; legal research; email to MM; draft further argument section	2.00 450.00/hr	900.00
10/29/2021	MR	Further attention/edits to letter in response to PMG's pre-motion letter	0.50 450.00/hr	225.00
11/11/2021	MR	Meeting with Mr. Villanueva; J.O. and K.G. as interpreters; edits to Villanueva Responses to Interrogatories	1.50 450.00/hr	675.00
	MR	Receive and review 5 Tellers' memo of law in opp to PMG's motion to dismiss	0.50 450.00/hr	225.00
11/21/2021	MR	Attention to discovery: draft 30(b)(6) deposition notice to PMG	1.50 450.00/hr	675.00
11/23/2021	MR	Continue drafting 30(b)(6) deposition notice duces tecum to PMG; draft 30(b)(6) deposition notice to 5 Tellers	2.50 450.00/hr	1,125.00
12/2/2021	MR	Further attention to deposition subpoena duces tecum to 5 Tellers; meeting with KG re [REDACTED]	0.50 450.00/hr	225.00
12/9/2021	MR	Receive and review letter from 1392 Boston Rd Assoc's and 160 Heights Enterpr's to opt-in plaintiff Nicolas Blanco; schedule in-person appt. with Mr. Blanco for Sunday afternoon at 3:30	0.50 450.00/hr	225.00
	MR	Tel. call with Jack Malley,	0.20 450.00/hr	90.00
	MR	Draft letter to all counsel re: upcoming depositions; failure of PMG to provide discovery	1.00 450.00/hr	450.00
12/12/2021	MR	Meeting in office with Mr. Blanco, opt-in	1.00 450.00/hr	450.00
12/15/2021	MR	File Plaintiffs' Memo of Law in Opp to PMG's motion to amend; draft and file affirmation of service NO CHARGE ADMIN	0.70	NO CHARGE
	MR	Receive and review PMG's reply brief	0.70 450.00/hr	315.00

			Hrs/Rate	Amount
12/16/2021	MR	Meeting with Mr. Blanco with M Cabezas as interpreter; draft Blanco Decl in support of motion to amend; review new documents provided by client	2.00 450.00/hr	900.00
	MR	Court Status Conference - Virtual; and preparations for same	1.00 450.00/hr	450.00
12/17/2021	MR	Emails with M Miller;	0.20 450.00/hr	90.00
12/29/2021	MR	Revisions to pre-motion letter	0.50 450.00/hr	225.00
12/30/2021	MR	Meeting in office with Mr. Blanco; review records; discussion re: [REDACTED] M Cabezas as interpreter	1.50 450.00/hr	675.00
1/4/2022	MR	Attn to pre-motion letter	1.50 450.00/hr	675.00
1/8/2022	MR	Attention to Mr. Liz' response to interrogatories; meeting with K Gulfo re [REDACTED] conference call with client and Ms. Gulfo; edits to rog answers	1.50 450.00/hr	675.00
1/11/2022	MR	Emails with Ms. Miller and defendants' counsel re: upcoming deposition schedule	0.20 450.00/hr	90.00
1/12/2022	MR	Conf call with MM and Jack Malley	0.50 450.00/hr	225.00
	MR	Attention to discovery: lengthy conference in office with Mr. Liz and MC	2.00 450.00/hr	900.00
1/18/2022	MR	Attention to Francisco Liz discovery responses	1.50 450.00/hr	675.00
1/21/2022	MR	Telephone call with Mr. Liz with MC as interpreter	0.40 450.00/hr	180.00
	MR	Teleph call with Mr. and Ms Liz; MC as interpreter	0.50 450.00/hr	225.00
1/24/2022	MR	Attention to Mr. Blanco's discovery responses; review documents; extensive meeting with Mr. Blanco with M. Cabezas as assistant/interpreter	2.00 450.00/hr	900.00
1/31/2022	MR	Attention to Nicolas Blanco discovery/documents: review documents extracted from his teleph.; further attention to rog resp's	2.00 450.00/hr	900.00
	MR	Meeting in office with Mr. Liz with KG as interpreter	0.50 450.00/hr	225.00
	MR	Meeting with client Francisco Liz in office; review discovery issues; interpreting by KG	1.50 450.00/hr	675.00
	MR	Conference call with M Miller and K Gulfo re: [REDACTED]	0.50 450.00/hr	225.00

			Hrs/Rate	Amount
2/1/2022	MR	Prepare for Blanco deposition	2.00 450.00/hr	900.00
2/3/2022	MR	Meeting in office with Mr. Blanco - deposition prep (M Cabezas and KG as interpreter)	2.00 450.00/hr	900.00
2/4/2022	MR	Defend Blanco deposition - full day	8.00 450.00/hr	3,600.00
2/6/2022	MR	Telephone calls with Meredith Miller re [REDACTED]	0.50 450.00/hr	225.00
2/7/2022	MR	Full-day deposition (continuation of Blanco deposition); and meetings with client; pre-deposition conference with court and obtain rulings on parties' dispute	8.00 450.00/hr	3,600.00
2/9/2022	MR	Meeting with Mr. Bonilla; MC as interpreter	1.00 450.00/hr	450.00
2/11/2022	MR	Emails with counsel for all parties regarding Peter Volandes deposition; telephone calls with M Miller re [REDACTED] review FRCP re same	0.50 450.00/hr	225.00
2/19/2022	MR	Review all deadlines; draft letter to Magistrate Judge Ramon E. Reyes Jr.; attention to mediator selection	1.50 450.00/hr	675.00
2/25/2022	MR	Attention to issues relating to potential application for trial deposition for Mr. Jose Hernandez [REDACTED]	1.00 450.00/hr	450.00
2/28/2022	MR	TC with Mr. Malley, co-counsel, MM, and Ms. Aiello	0.50 450.00/hr	225.00
3/1/2022	MR	TCs to Mr. Jose Hernandez' [REDACTED] with K. Gulfo; TC with Mr. Jose Hernandez, K. Gulfo as interpreter	0.60 450.00/hr	270.00
4/5/2022	MR	Telephone call with counsel for 5 Tellers' regarding mediation-related issues; review email chains related to same	0.30 450.00/hr	135.00
5/13/2022	MR	Comm's with Ms. Miller and JAMS re: pre-mediation conference call; mediation agreement and related issues	0.60 450.00/hr	270.00
5/17/2022	MR	Attn to mediation related issues	0.50 450.00/hr	225.00
5/18/2022	MR	Prepare for initial call with Mediator; participate in virtual conference/pre-mediation call.	1.50 450.00/hr	675.00
5/19/2022	MR	Conf with K Gulfo and M Miller re: [REDACTED] [REDACTED]	1.50 450.00/hr	675.00
5/20/2022	MR	Review of damages chart and discussions with K. Gulfo regarding [REDACTED]	2.00 450.00/hr	900.00
5/23/2022	MR	Attention to drafting of mediation statement	6.00 450.00/hr	2,700.00
	MR	LR re: housing credit issue	0.50 450.00/hr	225.00

			Hrs/Rate	Amount
5/24/2022	MR	T/C with co-counsel M. Miller and K. Gulfo	0.70 450.00/hr	315.00
	MR	Receive and review revised pre-mediation statement with MM's edits; further edits to same; further attention to exhibits.	2.00 450.00/hr	900.00
5/26/2022	MR	Plan and prepare for mediation; attention to issues raised by defendants' counsel; discussions with MM; review all motion documents filed by all parties	3.00 450.00/hr	1,350.00
	MR	Draft email to all counsel responding to PMG's request for clarification of Plaintiffs' settlement demand; discussions with MM re [REDACTED] review costs incurred to date in connection with same	1.00 450.00/hr	450.00
5/27/2022	MR	Prepare for mediation; extensive conversations with named plaintiffs and opt-in plaintiffs.	4.00 450.00/hr	1,800.00
5/31/2022	MR	Appear/attend full day mediation	9.00 450.00/hr	4,050.00
6/1/2022	MR	Comm's with mediator (Judge Gold) regarding allocations of settlement	0.50 450.00/hr	225.00
6/7/2022	MR	T/c with Mario Villanueva re: [REDACTED]	0.20 450.00/hr	90.00
6/8/2022	MR	Draft email to PMG's counsel; discussion with KG re: [REDACTED] [REDACTED]	0.10 450.00/hr	45.00
8/23/2022	MR	Tel. call with attorney Aiello for PMG; review scheduling order	0.20 450.00/hr	90.00
	MR	Attention to lodestsar/billing history	1.00 450.00/hr	450.00
8/31/2022	MR	Telephone call with M Miller re: [REDACTED] [REDACTED]	0.50 450.00/hr	225.00
	MR	Meeting with clients; K. Gulfo as interpreter	1.00 450.00/hr	450.00
9/8/2022	MR	Tel. call with Mr. Hernandez, with KG as interpreter, re: [REDACTED] [REDACTED]	0.10 450.00/hr	45.00
10/11/2022	MR	Tel. call with MM and KG re: [REDACTED] [REDACTED]	0.30 450.00/hr	135.00
11/5/2022	MR	Review and extensive revisions to proposed Cheeks letter	2.00 450.00/hr	900.00
11/17/2022	MR	Meeting in office with M. Villanueva, K. Gulfo as interp.	0.50 450.00/hr	225.00
11/29/2022	MR	Tel. call with M Miller re: [REDACTED] NO CHARGE	0.20	NO CHARGE

			Hrs/Rate	Amount
12/1/2022	MR	Telephone call with T Tellers' attorney, Jack Malley	0.40 450.00/hr	180.00
12/8/2022	MR	Emails with all counsel re: settlement agreement; telephone call with the Spanish Group re translating settlement agreement	0.20 450.00/hr	90.00
12/15/2022	MR	Attn to execution of settlement agreement; comm's with clients re same with KG as interpreter; attempt to reach plaintiff Villanueva; attention to loadstar/billing history	0.50 450.00/hr	225.00
12/19/2022	MR	Telephone call with Mr. Ferreira re: [REDACTED] [REDACTED] KG as interpreter; comm's with MM re [REDACTED]	0.10 450.00/hr	45.00

SUBTOTAL:	[182.15	81,562.50]
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Joselin Orellana

10/8/2020	JO	Attention to public record search re. defts' buildings	2.00 95.00/hr	190.00
10/14/2020	JO	Attention to public record search re. defts' buildings (continued)	3.00 95.00/hr	285.00
10/16/2020	JO	Attention to public record search re. defts' buildings (continued)	2.50 95.00/hr	237.50
10/21/2020	JO	Conducted legal research/public records (ACRIS/HPD) search re. PMG buildings; generate index	3.00 95.00/hr	285.00
12/11/2020	JO	Review materials from Plaintiff Ana Liz; notes re. same	0.50 95.00/hr	47.50
12/14/2020	JO	Attention to review of Mr. and Mrs. Liz' materials; notes re. same (continued)	4.00 95.00/hr	380.00
12/16/2020	JO	T/C with Mario Villanueva	0.10 95.00/hr	9.50
12/24/2020	JO	Indexing of defts' opp. to pltfs' motion for cond. cert. for hardcopy file	0.50 95.00/hr	47.50
1/8/2021	JO	Attention to file management re. Jose Blanco's documents; prepared damages chart	1.00 95.00/hr	95.00
1/12/2021	JO	Further edits to working damages chart re. Jose Blanco; review of notes and emails	2.50 95.00/hr	237.50
11/11/2021	JO	Participate in meeting with Mr. Villanueva and MR; interpret during same	1.70 95.00/hr	161.50
4/21/2022	JO	Attention to: extensive edits of damages chart and comm's with K. Gulfo re. same; meeting/discussion with MR	5.50 95.00/hr	522.50
4/23/2022	JO	Attention to update of damages	3.00 95.00/hr	285.00

			<u>Hrs/Rate</u>	<u>Amount</u>
	SUBTOTAL:		[29.30	2,783.50]
11/16/2019 MC	Meeting with clients in office; interpret during same		1.50 115.00/hr	172.50
1/11/2020 MC	Meeting and intepret for MR with clients Mr and Ms. Liz, Mr. Bonilla and Mr. Ferreira		2.50 115.00/hr	287.50
1/18/2020 MC	Meeting with new opt-in, Mario Villanueva; obtain factual background; explain consent form and retainer agreement in Spanish to him; draft memo re all info to KG, MM and MR; further conference with MR and client in office		2.50 115.00/hr	287.50
2/21/2020 MC	attention to documents provided by clients		1.50 115.00/hr	172.50
2/23/2020 MC	Review, organize and scan clients' documents		4.00 115.00/hr	460.00
5/13/2020 MC	Assist with interpreting during call with clients		0.50 115.00/hr	57.50
5/15/2020 MC	Interpret during T/C with Mr. and Mrs. Liz		0.50 115.00/hr	57.50
1/19/2021 MC	Meeting with Jose Blanco and MR; translate		1.00 115.00/hr	115.00
1/30/2021 MC	Participate in initial client conference with Ramon Ferreira; interpret/verbally translate retainer agreement and consent form; create new file;		2.50 115.00/hr	287.50
9/3/2021 MC	Translate and assist with telephone call with MR and Mr. Hernandez		0.20 115.00/hr	23.00
12/12/2021 MC	Meeting with MR and Mr. Blanco - interpret; receive and review client's documents		1.00 115.00/hr	115.00
12/30/2021 MC	Meeting with Mr. Blanco and interpret for MR; review texts and other materials		1.50 115.00/hr	172.50
1/12/2022 MC	Meeting with Marc and F Liz - translate and assist with rog answers		2.00 115.00/hr	230.00
1/24/2022 MC	Meeting with MR and Mr. Blanco; interpret and assist with preparing client's rog responses		2.00 115.00/hr	230.00
MC	Review of Spanish language interrogatory responses relating to Francisco Liz		0.70 115.00/hr	80.50
1/26/2022 MC	Telephone calls with Mr. Blanco and Mr. Liz [REDACTED]; review document production and identify new documents to be produced		4.00 115.00/hr	460.00
2/1/2022 MC	Review of Mr. Blanco's documents; communications with K. Gulfo re. [REDACTED]		1.00 115.00/hr	115.00

			<u>Hrs/Rate</u>	<u>Amount</u>
2/2/2022	MC	Meet with Jose Nicolas Blanco	3.00 115.00/hr	345.00
	MC	Lengthy meeting with Mr. Blanco to prepare for deposition; review written discovery; meetings with MR and KG	6.00 115.00/hr	690.00
2/3/2022	MC	Meeting with Mr. Blanco	6.00 115.00/hr	690.00
	MC	Lengthy meeting with Mr. Blanco - deposition preparation	5.00 115.00/hr	575.00
2/4/2022	MC	Comm's with Mr. Blanco	0.10 115.00/hr	11.50
	MC	Assist and attend - Blanco deposition	4.00 115.00/hr	460.00
2/6/2022	MC	Telephone call with Jonny Bonilla	0.20 115.00/hr	23.00
2/9/2022	MC	Meet with Mr. Blanco and Mr. Bonilla	1.30 115.00/hr	149.50
2/17/2022	MC	TC with K. Gulfo re. [REDACTED]	0.20 115.00/hr	23.00
3/10/2022	MC	Meeting with Mr. Blanco	0.50 115.00/hr	57.50
5/12/2022	MC	Comm's with Mr. Blanco	0.27 115.00/hr	30.67
6/8/2022	MC	Communications with Mr. Blanco	0.50 115.00/hr	57.50
	MC	Receive and review texts comm's from Mr. Blanco	0.20 115.00/hr	23.00
SUBTOTAL:			<hr/> <hr/>	<hr/> <hr/>
			[56.17]	6,459.17]

Karina Gulfo

11/7/2019	KG	Meeting with Ana & Francisco Liz; Daniel Rodriguez; Jonny Bonilla; Waly Ferreira; interpret during same	1.00 115.00/hr	115.00
	KG	Create new case file; save notes to same; obtain documents from clients	0.50 115.00/hr	57.50
12/13/2019	KG	Call with Francisco Liz; email to MR re. [REDACTED]	0.10 115.00/hr	11.50
12/19/2019	KG	Comm's with Mr. and Ms. Liz; review documents provided by clients; discussions re same with MR	1.50 115.00/hr	172.50
12/23/2019	KG	Review draft complaint	0.80 115.00/hr	92.00

			Hrs/Rate	Amount
1/10/2020	KG	Edit and file complaint; draft civil cover sheet and summonses	2.00 115.00/hr	230.00
1/17/2020	KG	Call with Mario Villanueva	0.10 115.00/hr	11.50
1/24/2020	KG	Call with Francisco Liz	0.10 115.00/hr	11.50
1/29/2020	KG	Filed affidavits of service as to Defendants John and Peter Volandes via ECF	0.10 115.00/hr	11.50
1/31/2020	KG	Filed affidavits of service on ECF as to all corp. defendants and 2nd AOS re. Peter Volandes	0.20 115.00/hr	23.00
2/22/2020	KG	Call from attorney Michael Doyle; e-mail to MR re. [REDACTED]	0.10 115.00/hr	11.50
3/30/2020	KG	Review of Michael Doyle's e-mails to MR; download of documents; send same to MR and Meredith via e-mail	0.40 115.00/hr	46.00
4/2/2020	KG	Email to Ds counsel re. selection of mediator; call with MR and MRM re. same	0.20 115.00/hr	23.00
	KG	Calendar new deadlines; email to MR re. [REDACTED]	0.40 115.00/hr	46.00
4/16/2020	KG	Call with atty Jackie Aiello re; her client; email same to MR	0.10 115.00/hr	11.50
5/13/2020	KG	Call with MR and clients re. [REDACTED]	0.70 115.00/hr	80.50
5/18/2020	KG	Attention to damages chart; calls with MR re. [REDACTED]; e-mails to MR and MM	6.00 115.00/hr	690.00
5/26/2020	KG	Call with MR and Johnny Bonilla	0.30 115.00/hr	34.50
5/27/2020	KG	Edit to damages chart; email same to MR and MM	0.60 115.00/hr	69.00
6/9/2020	KG	Edits to disclosures and damages chart	1.00 115.00/hr	115.00
6/10/2020	KG	Email to defts re. damages chart; plaintiffs' production and disclosures	0.20 115.00/hr	23.00
7/2/2020	KG	T/C to all clients re. [REDACTED]; email to MR and MM re. same	0.20 115.00/hr	23.00
7/6/2020	KG	Attention to production/discovery	3.60 115.00/hr	414.00
7/8/2020	KG	Set up Zoom call with clients; text communications with all clients; e-mail details to MR, MM and MCR	0.30 115.00/hr	34.50

			Hrs/Rate	Amount
7/8/2020	KG	Comm's with all clients regarding [REDACTED]	2.50 115.00/hr	287.50
7/10/2020	KG	Attention to additional plaintiff production; emails to MR and MM re. [REDACTED]; send confidentiality agreement to all clients; calls with clients re. [REDACTED]	1.00 115.00/hr	115.00
7/13/2020	KG	Comm's with MR re. interpreter service for upcoming mediation; email to all parties re. same	0.10 115.00/hr	11.50
	KG	Call with Ms. Ana Liz; email re. [REDACTED] to Meredith and Marc	0.20 115.00/hr	23.00
7/15/2020	KG	Calls and e-mails with Leo from Magna Legal Services re. translation services at upcoming Zoom mediation	0.40 115.00/hr	46.00
7/17/2020	KG	Attention to organization of hard copies of plaintiffs' production	2.50 115.00/hr	287.50
	KG	Call with Mr. Liz and Meredith Miller	0.10 115.00/hr	11.50
7/29/2020	KG	Attention to plaintiff's production	1.00 115.00/hr	115.00
8/18/2020	KG	Left voicemail message for Jonny Bonilla	0.10 115.00/hr	11.50
	KG	Edit mediation report; send to MM; send to court	0.50 115.00/hr	57.50
9/8/2020	KG	Create and save file for documents provided by Mr. Malley, defts' counsel	0.10 115.00/hr	11.50
	KG	Call with Ms. Liz and MR; follow-up comm's with Ms. Liz	0.30 115.00/hr	34.50
9/14/2020	KG	Call with Francisco Liz; email to MR and MM re. [REDACTED]	0.30 115.00/hr	34.50
9/28/2020	KG	Call with Mr. Liz's family member'; e-mail response to Mr. Liz	0.20 115.00/hr	23.00
10/13/2020	KG	Call with Francisco Liz; set up meeting and texts with client re. [REDACTED]	0.20 115.00/hr	23.00
10/15/2020	KG	Proofread interrogatories to PMG and made final revisions; e-mail to all parties	1.50 115.00/hr	172.50
10/20/2020	KG	Zoom meeting with Marc and Jonny Bonilla	1.00 115.00/hr	115.00
10/30/2020	KG	Interpret during calls with clients	1.00 115.00/hr	115.00
	KG	Call with Mario Villanueva and Waly Ferreira; interpret during same	1.00 115.00/hr	115.00

			Hrs/Rate	Amount
11/4/2020	KG	Call with Waly Ferreira and MR; edits to decl	1.00 115.00/hr	115.00
11/5/2020	KG	Attn to production; indexing of same	0.50 115.00/hr	57.50
11/9/2020	KG	Public records research	2.00 115.00/hr	230.00
	KG	Meeting with Jonny Bonilla	0.50 115.00/hr	57.50
	KG	Call with The Spanish Group LLC, document translation service	0.20 115.00/hr	23.00
	KG	Call with Mr. Liz	0.10 115.00/hr	11.50
	KG	Proofread Memo of Law	1.00 115.00/hr	115.00
	KG	Continued attention to research of Deft PMG's buildings	2.50 115.00/hr	287.50
12/14/2020	KG	Attn to review of videos provided by clients	1.60 115.00/hr	184.00
12/30/2020	KG	Call with Jose Blanco; email to JO, MR and MM re. same	0.20 115.00/hr	23.00
1/4/2021	KG	Call with Mr. Liz	0.10 115.00/hr	11.50
1/7/2021	KG	Interpret during call with Mr. Blanco	0.60 115.00/hr	69.00
1/11/2021	KG	Call with Jose Blanco; draft consent form and retainer; email to MR re. [REDACTED]	0.60 115.00/hr	69.00
1/12/2021	KG	Communications with The Spanish Group re. translation costs	0.10 115.00/hr	11.50
	KG	Call with Mr. Blanco	0.10 115.00/hr	11.50
1/13/2021	KG	Edit to consent form; edits and review of Blanco affidavit	0.30 115.00/hr	34.50
1/14/2021	KG	Communications with The Spanish Group re. translation of declaration	0.10 115.00/hr	11.50
1/20/2021	KG	Review Pltfs' Reply; make changes to same	1.00 115.00/hr	115.00
1/25/2021	KG	Call with Blanco; emails to Marc, MRM and JO re. [REDACTED]; communications with translation service	0.50 115.00/hr	57.50

			Hrs/Rate	Amount
2/2/2021	KG	Call with Mr. Blanco and MR	0.20 115.00/hr	23.00
3/25/2021	KG	Calls with Ana Liz and Waly Ferreira	0.20 115.00/hr	23.00
3/29/2021	KG	Further attention tod discovery responses	0.60 115.00/hr	69.00
4/20/2021	KG	Comm's with The Spanish Group translation services re. translation of opt-in notice NO CHARGE ADMIN	0.20	NO CHARGE
4/28/2021	KG	Attention to mailing of notice to employees of PMG	1.00 115.00/hr	115.00
5/18/2021	KG	File Jose Hernandez consent to join via ECF; comms with MR and MM re. [REDACTED]	0.20 115.00/hr	23.00
5/21/2021	KG	T/C with Ramon Ferreira and MR; interpret during same	0.50 115.00/hr	57.50
6/15/2021	KG	Comms with MR re. [REDACTED]	0.10 115.00/hr	11.50
6/28/2021	KG	Email comms with MM	0.20 115.00/hr	23.00
7/24/2021	KG	Receive and review discovery from Defts	0.50 115.00/hr	57.50
7/26/2021	KG	TCs with Mr. and Mrs. Liz; emails to MR and MM re. [REDACTED]	0.20 115.00/hr	23.00
8/18/2021	KG	T/C with Jonny Bonilla	0.10 115.00/hr	11.50
9/2/2021	KG	Assist with discovery responses by opt-in plaintiffs; remote discussions with clients throughout the day; review documents provided by clients	4.50 115.00/hr	517.50
10/6/2021	KG	In office meeting with opt-in Jose Hernandez and MR	2.50 115.00/hr	287.50
10/7/2021	KG	Email comm's with MR and MM re. [REDACTED]	0.10 115.00/hr	11.50
10/8/2021	KG	Attention to production; produce further documents re. Plaintiff Jose Hernandez; email comm's with MR and MM; email to all parties; uploading of same to Dropbox	0.70 115.00/hr	80.50
	KG	Email comm's with MR and MM;	0.10 115.00/hr	11.50
10/29/2021	KG	Meeting in office with Mr. Jose Hernandez re. [REDACTED] [REDACTED] email to MR and MM re. [REDACTED]	2.00 115.00/hr	230.00
11/5/2021	KG	TC with Mario Villanueva; schedule appt.	0.10 115.00/hr	11.50

			Hrs/Rate	Amount
11/8/2021	KG	Attn to discovery	2.00 115.00/hr	230.00
11/10/2021	KG	T/C to Mr. Bonilla	0.10 115.00/hr	11.50
11/11/2021	KG	Meeting with MR and Mr. Villanueva in office; interpret during same	1.00 115.00/hr	115.00
11/15/2021	KG	Send Mario Villanueva Rog responses to all parties	0.10 115.00/hr	11.50
11/23/2021	KG	Edits drafts of depo. notices to Defendants	1.00 115.00/hr	115.00
11/24/2021	KG	Final review and proofread depo. notice as to Deft PMG; comm's with MR; send same to all parties	1.00 115.00/hr	115.00
11/29/2021	KG	Communications with Pltf Jonny Bonilla	0.20 115.00/hr	23.00
12/3/2021	KG	Final review and edit to 5 Tellers Depo; send same to all parties	1.00 115.00/hr	115.00
12/7/2021	KG	Meeting with MR and Jonny Bonilla in office; interpret during same; review of interrogatory responses	2.00 115.00/hr	230.00
12/10/2021	KG	Email to all parties re. Plaintiff Bonilla's Responses to rogs of deft. PMG	0.20 115.00/hr	23.00
1/4/2022	KG	Proofread pre-motion letter; edits to same	0.50 115.00/hr	57.50
1/20/2022	KG	Attention to review of Mr. Liz' documents; organize same; send same to MR and MM; email comm's re. production	2.00 115.00/hr	230.00
1/31/2022	KG	Attn to discovery, includ rogs and document production; meetings throughout the day with MR; meeting in office with Mr. Liz and MR; interpret during same; review of Plaintiff Blanco's documents	3.50 115.00/hr	402.50
2/1/2022	KG	Email to Marcela Cabezas; updates to calendar to reflect current deposition schedule	0.10 115.00/hr	11.50
	KG	Review documents from Mr. Blanco; comm's with Marcela Cabezas re. [REDACTED]	3.00 115.00/hr	345.00
2/2/2022	KG	Attention to production; email to all parties	1.00 115.00/hr	115.00
	KG	Meet with Jose Nicolas Blanco, MR and MC	1.00 115.00/hr	115.00
2/3/2022	KG	Participate in meeting with MR, Mr. Blanco and MC	1.50 115.00/hr	172.50
	KG	Attention to preparation for deposition of Mr. Blanco; organize documents; attention to computer and sound equipment; attention to further discovery	4.00 115.00/hr	460.00

			Hrs/Rate	Amount
2/4/2022	KG	Assist with full-day Blanco deposition	4.00 115.00/hr	460.00
2/7/2022	KG	Assist MR with deposition preparation; review defts' exhibits	0.60 115.00/hr	69.00
	KG	Attention to discovery	3.00 115.00/hr	345.00
	KG	Assist at second day of Blanco deposition	4.00 115.00/hr	460.00
2/8/2022	KG	T/C with Mr. Blanco; email to MR and MM re. [REDACTED]	0.10 115.00/hr	11.50
2/9/2022	KG	Meet with Mr. Blanco and Mr. Bonilla	1.30 115.00/hr	149.50
2/16/2022	KG	T/C with Mr. Bonilla; comm's with Marcela	0.20 115.00/hr	23.00
2/17/2022	KG	TC with Marcela Cabezas re. [REDACTED]	0.20 115.00/hr	23.00
2/18/2022	KG	T/C with Mr. Bonilla	0.10 115.00/hr	11.50
2/19/2022	KG	Proofread letter to Court	0.20 115.00/hr	23.00
2/23/2022	KG	Calendar new discovery and motion to amend complaint deadlines	0.10 115.00/hr	11.50
	KG	Attention to lodestar/billing history review	1.00 115.00/hr	115.00
2/25/2022	KG	TC with Jose Hernandez re. [REDACTED]	0.20 115.00/hr	23.00
2/28/2022	KG	T/Cs to Mr. Jose Hernandez	0.10 115.00/hr	11.50
3/1/2022	KG	T/Cs to Mr. Jose Hernandez' family; TC with MR and Mr. Jose Hernandez; attn to notes re. same	0.60 115.00/hr	69.00
3/10/2022	KG	T/C with Mr. Blanco	0.10 115.00/hr	11.50
4/11/2022	KG	T/Cs with Mr. and Mrs. Liz; Waly Ferreira and Mr. Blanco	0.30 115.00/hr	34.50
4/21/2022	KG	Discussion with JO re. update to damages	0.30 115.00/hr	34.50
5/16/2022	KG	T/C with all clients; email to MR and MM re. [REDACTED]	0.60 115.00/hr	69.00

			Hrs/Rate	Amount
5/17/2022	KG	Attn to damages; updates and review of same; send to MM and MR	1.00 115.00/hr	115.00
5/18/2022	KG	T/C to Mr. Malley, leave message	0.10 115.00/hr	11.50
	KG	Attn to edits to damages chart	0.20 115.00/hr	23.00
	KG	Email with interpreter	0.10 115.00/hr	11.50
5/19/2022	KG	Edits to damages chart	0.40 115.00/hr	46.00
5/20/2022	KG	Further edits to damages chart; review of same; meeting with MR; email to all parties re. damages	3.00 115.00/hr	345.00
5/23/2022	KG	Attn to review/edits re. mediation statement	2.00 115.00/hr	230.00
5/24/2022	KG	Conference call with Meredith Miller and MR; final edits to mediation statement, collate exhibits & send same to Judge Gold	1.00 115.00/hr	115.00
5/25/2022	KG	Text message communications with all Plaintiffs	0.30 115.00/hr	34.50
5/26/2022	KG	Attention to lodestar calculations in advance of mediation; meeting with MR re [REDACTED]; T/C with MM	1.00 115.00/hr	115.00
	KG	Comm's with JAMS re: confidentiality agreement required for execution by plaintiffs	0.20 115.00/hr	23.00
	KG	Comm's with Magna Legal Services re: confirm interpreter for in-person interpret., all day Tues	0.20 115.00/hr	23.00
5/27/2022	KG	T/C with Mr. Liz	0.10 115.00/hr	11.50
5/30/2022	KG	Prepare documents for mediation; edits to damages, send same to MR and MM	2.00 115.00/hr	230.00
5/31/2022	KG	T/C with Mr. Jose Hernandez, text communications with clients	0.30 115.00/hr	34.50
	KG	T/Cs with Meredith Miller and MR; further edits to damages chart	1.00 115.00/hr	115.00
6/7/2022	KG	T/Cs and text message communications with Mr. Blanco; T/C with Mr. Liz	0.30 115.00/hr	34.50
	KG	Interpret during call with Mr. Villanueva	0.20 115.00/hr	23.00
6/16/2022	KG	T/C with Mr. Blanco; email comm's to MR, MC and MM re. [REDACTED]	0.20 115.00/hr	23.00

			Hrs/Rate	Amount
6/20/2022	KG	T/C with Mr. Blanco; email comms with MR and MM re. [REDACTED]; T/C with Mr. and Mrs. Liz	0.20 115.00/hr	23.00
8/31/2022	KG	Meeting with J. Blanco, M. Villanueva, Waly Ferreira, Ramon Ferreira; interpret during same	1.00 115.00/hr	115.00
10/26/2022	KG	T/C with Mr. Bonilla; email to MM re. [REDACTED]	0.20 115.00/hr	23.00
11/5/2022	KG	Proofread and edit Cheeks letter	0.60 115.00/hr	69.00
11/17/2022	KG	Meeting with Mario Villanueva and MR; interpret during same	0.50 115.00/hr	57.50
12/7/2022	KG	Comm's with The Spanish Group translation services	0.20 115.00/hr	23.00
12/13/2022	KG	Attn to time record/billing history review	0.70 115.00/hr	80.50
12/14/2022	KG	Attn to time record/billing history review	1.00 115.00/hr	115.00
	KG	Attn to Cheeks applc exhibits and tel. calls with clients	2.50 115.00/hr	287.50
12/15/2022	KG	T/C and texts with Jose Hernandez; T/C with Mr. Blanco; meeting with Ramon Ferreira, interpret during same	0.70 115.00/hr	80.50
12/16/2022	KG	Meetings with Francisco Liz, Ana Liz and Nicolas Blanco, interpret during same	1.00 115.00/hr	115.00
12/20/2022	KG	T/C to Mario Villanueva	0.10 115.00/hr	11.50
12/22/2022	KG	Attn to finalize exhibits for Cheeks applc, includ final bill	0.70 115.00/hr	80.50
	KG	Meeting with MR re: lodestar/history bill	0.40 115.00/hr	46.00
SUBTOTAL:			<hr/> [127.10	<hr/> 14,593.50]
For professional services rendered			<hr/> 394.72	<hr/> \$105,398.67
Additional Charges :				
<u>Marc A. Rapaport</u>				

12/19/2019	In-house copies at 0.25 per page	5.50
1/10/2020	In-house copies at 0.25 per page	17.00
	Filing Fee - EDNY	400.00
1/11/2020	In-house copies at 0.25 per page	33.25
1/17/2020	NY Secretary of State Fees - (service of process)	160.00
1/18/2020	In-house copies	5.25
2/4/2020	Gotham Process Service Fee - Suffolk County Service	120.00

	<u>Amount</u>
2/11/2020 In-house copies at 0.25 per page	0.75
2/26/2020 Gotham Process Inc - Process Server Fees, Work Order Nos. 1148722-1148728	364.00
4/2/2020 Pacer	0.90
5/13/2020 Pacer	2.10
5/15/2020 Pacer	4.50
5/19/2020 Pacer	3.80
5/21/2020 Pacer	0.40
5/28/2020 Pacer	4.20
6/10/2020 Pacer	1.00
7/9/2020 Pacer	2.20
7/16/2020 Magna Legal Services, Interpreter fees, Invoice No. 607381	1,280.00
7/17/2020 In-house copies	30.00
9/8/2020 In-house copies	5.75
Pacer	6.60
9/30/2020 Pacer	2.30
Pacer	1.70
10/30/2020 Pacer	1.00
11/2/2020 in-house copies at .25 pp	66.00
11/6/2020 The Spanish Group - Invoice No. 86125; Translation of Declarations	167.31
The Spanish Group LLC - translation cost	61.10
11/9/2020 Translation Expense - The Spanish Group, LLC Order No. 86611	94.60
Pacer fees	6.20
1/12/2021 The Spanish Group, LLC, certified document translation - Order #95391	30.00
Mess Kollective Messengers; date of service 1/12/2021	69.00
1/13/2021 Mess Kollective Messengers, rush delivery service, date of service: 1/13/2021	84.00
1/14/2021 The Spanish Group - Translation Services; Order No. 95898 - (certified translation of declaration)	95.76
2/2/2021 In-house copies at 0.25 per page	1.00
4/20/2021 The Spanish Group, Document Translation Services, Order #112340	155.16
5/1/2021 Postage	19.20
8/30/2021 Pacer	1.40
11/8/2021 In-house copies	8.50
12/12/2021 In-house copies at 0.25 per page	5.75
12/20/2021 The Spanish Group Document Translation Order #163097	131.04
12/30/2021 Pacer	0.90
In-house copies at 0.25 per page	3.00
1/4/2022 in-house copies	5.00
1/18/2022 Pacer U.S. Courts	1.00
The Spanish Group - Translation Order Confirmation #168691	368.90
1/31/2022 I Can Fix It For You, Inc. - Cellular Phone Expert - Invoice No. 49100178	219.00
The Spanish Group - Translation Services - Order #171681	30.00
In house copies at 0.25 per page	50.75
2/3/2022 In-house copies	1.25
2/10/2022 Court Reporter - Veritext (Inv. No. 5561369)	1,616.30
3/1/2022 Veritext Deposition Transcript/Court Reporter, Invoice No. 5596583	600.58
5/30/2022 In-house copies	1.50
6/7/2022 Magna Legal Services, Interpreter Services, Invoice No. 864083	1,782.18
 SUBTOTAL:	 [8,128.58]
 Total additional charges	 \$8,128.58
 For professional services rendered	 394.72 \$113,527.25

Timekeeper Summary

Name	Hours	Rate	Amount
Marc Rapaport	181.25	450.00	\$81,562.50

Name	Hours	Rate	Amount
Marc Rapaport	0.90	0.00	\$0.00
Joselin Orellana	29.30	95.00	\$2,783.50
Karina Gulfo	126.90	115.00	\$14,593.50
Karina Gulfo	0.20	0.00	\$0.00
Marcela Cabezas	56.17	115.00	\$6,459.17